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**EX PARTE** 

DEFICE OF THE SECRETARY

October 20, 1999

Ms. Magalie Roman Salas Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

Re: CC Docket 94-129 Unauthorized Changes of Consumers Long Distance Carriers

Dear Ms. Salas:

Today, I had a conference call meeting with Glenn Reynolds-Chief, Enforcement Division of the Common Carrier Bureau and members of his staff.

The purpose of the call was to update Commission staff on slamming related issues being worked in the industry's Ordering and Billing Forum (OBF). Attached are copies of the two OBF issues discussed on the call. The Commission was also advised that the OBF's next meeting is scheduled for November 8 through November 11.

Please include a copy of this correspondence in the public record of the above-captioned proceeding.

Sincerely, Marie Breslix

Attachments

cc: G. Reynolds

M. Seifert

C. Heitkamp

A. Cheng

K. Jackson

No. of Copies rec'd 0 + 1
List ABCDE

OBF Issue Number 1877

Date Submitted 2/23/99

Date Accepted 2/26/99 at OBF #Full Committee Conf. Call

Initial Closure 5/7/99 at OBF #66

Final Closure at OBF #

Issue Category ACTIVE

Part B, Page 1 (Committee Use Only)

Issue Title: Identification of Previous Carrier on PIC Disputes/Switchback

Issue Statement: A need exists to identify the previous carrier on PIC Disputes/Switchback situations.

Impact of Other Issues or Procedures: 1445

Desired Results: Create a new data element to identify the previous carrier for inclusion on TCSIS relating to PIC Disputes/Switchback notification.

Committee Assignment:

Associated Committee:

Company: AT&T

**SBC** 

Address: 913 S. 6th Street

Springfield, IL 62703

370 3<sup>rd</sup> Street

San Francisco, CA 94107

Issue Champion: Nada Carrigan

Scott Burns

Telephone: 217-788-6206

415-545-7277

Resolution: Created new data Element: Disputed CIC, position 811-814 and updated associated data matrices, TCSI definitions and Definition of Terms section.

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Issue Category	ACTIVE

Part B, Page 2 (Committee Use Only)

Issue Title: Identification of Previous Carrier on PIC Disputes/Switchback

Status History:

OBF #66 5/5/9

The Committee agreed to create a new data element (Disputed CIC) to identify unauthorized/authorized CICs on PIC disputes or switchback (no fault) TCSIs. The Committee had also reviewed the possibility of making the existing data element Previous CIC (Positions 757-760) a dual use field. However, Previous CIC cannot be used due to the location of Special Services Indicator (Position 757).

#### **DISPUTED CIC (CARRIER IDENTIFICATION CODE)**

**DEFINITION:** 

This element identifies the CIC of the Access Customer (AC) involved in an end user disputed PIC Change.

NOTE: Unauthorized CIC should be populated only on TCSIs 2011 and 2023. Authorized CIC should be populated only on TCSIs 2217, 2218, 2219 and 2229.

CARE USAGE: Populated with numeric characters or filled with spaces.

DATA CHARACTERISTICS: 4 Alphanumeric Characters

EXAMPLE: 4 Digit CIC - 0123

DETAIL RECORD LAYOUT POSITION:

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Part B, Page 3 (Committee Use Only)

Issue Title: Identification of Previous Carrier on PIC Disputes/Switchback

AP to AC: 811-814 AC to AP: N/A

The Committee agreed to review all the current PIC Dispute/Switchback (No Fault) TCSIs as part of this issue. Discussion brought out that there are some companies (as example Bell Canada) using CARE that are not impacted by FCC regulations. Also, it may be some time before all APs are able to implement changes to address all of the FCC's new requirements. Therefore, it was agreed that no PIC Dispute/Switchback TCSIs would be changed at this time. A new issue can be brought in to the Committee if it is necessary to make future changes.

The issue champion agreed that TCSIs 2011 and 2219 meet the needs of the FCC order when populated with the new data element Disputed CIC. The Committee agreed that the unauthorized CIC should be populated only on TCSIs 2011 & 2023 and the authorized CIC should only be populated on TCSIs 2217, 2218, 2219 & 2229 which deal with PIC Disputes/Switchback. This data element should not be populated on any other existing TCSIs.

The detail record layouts were updated with the new data element. It was also added to the batch and TBIE data matrices as "S" for specified for the above TCSIs.

Additional discussion was held surrounding the new FCC order and the impacts to the Illinois CUB (Citizens Utility Board) order of 1987(?) which previously created the PIC Dispute process. The Committee agreed that any concerned company should investigate the possible impact. Also, some companies voiced CPNI constraint concerns that may not allow support of this new data element.

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Part B, Page 4 (Committee Use Only)

#### Issue Title: Identification of Previous Carrier on PIC Disputes/Switchback

TCSIs 2011 and 2023 had the following sentence added for clarification as to what CIC should be populated in the Disputed CIC field.

For this TCSI, the contents of the Disputed CIC data element should be the reported unauthorized CIC.

TCSIs 2217, 2218, 2219 and 2229 also had the following sentence added for clarification as to what CIC should be populated in the Disputed CIC field.

For this TCSI, the contents of the Disputed CIC data element should be the authorized CIC.

The following terms were added to the Definition of Terms section (12.2) of the CARE ISI document:

Authorized CIC is the gaining carrier authorized by the end user.

Unauthorized CIC is the losing carrier in a disputed PIC selection.

The Issue moved to initial closure.

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#### Part A, Page 1

Issue Title: AC Subscription Order For End User Customer Identified Unauthorized Change from Submitting AC

**Issue Statement**: A need exists for ACs to uniquely submit a subscription order to the AP that is a result of an end user customer's contact due to an unauthorized change away from the submitting AC.

Impact of Other Issues or Procedures: 1877 and 1445

**Desired Results**: Create a new TCSI 01XX to be submitted by an AC upon notification from an end user of an alleged unauthorized carrier change. Create response TCSIs for the newly created TCSI 01XX that may include TCSIs 20XX, 22XX, 40XX, 42XX and necessary rejects and or/ newly created slamming related data elements.

Committee Assignment: Subscription

**Associated Committee:** 

Company: AT&T Issue Champion: Nada Carrigan

Address: 913 S. 6<sup>th</sup> Street Telephone: 217-788-6206

Springfield, IL 62703

**Resolution**: Three new TCSIs 0120, 0121 & 0122 were created for ACs to submit upon notification from an end user of an alleged unauthorized carrier change. Applicable response TCSIs were created: 2039, 2243, 2832, 3161, 3162, 3163, 4014 & 4216. The name of TCSI 3130 was modified.

Status History:

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#### Part A, Page 2

Issue Title: AC Subscription Order For End User Customer Identified Unauthorized Change from Submitting AC

#### OBF 66 Status History 5/5/99

The Committee reviewed the proposed TCSI 01XX and determined the need to create TCSIs 01XX to reflect WTN only, specific terminals and WTN with associated terminals PIC orders. The PIC Change Charge Indicator will be required with "Y" on the new TCSIs 01XX for the submitting AC to pay the charge. One new TCSI 20XX, 2 new rejects and one new TCSI 22XX were created.

Discussion was held on how specific companies may implement this new dispute process. Some companies may not reject the new 01XX if the AC was not the previous carrier. Some companies may reject with one of the new rejects and the AC would need to resubmit the order using a non-dispute TCSI 01XX.

#### Status History 5/6/99

The Committee created three new TCSIs 01XX to be used whenever an end user customer contacts the AC to report an unauthorized PIC change by another AC. The Committee agreed to make the PIC Change Charge Indicator "specified" on all three new 01XXs. If an AP requires the PIC Change Charge Indicator populated with "Y", that is considered an implementation issue.

0120= All Terminals, If Any, With This Working Telephone Number (WTN) - Disputed PIC Change - End User Initiated Through AC

All terminal numbers in a group associated with the WTN provided, are to be subscribed to the AC.

0121= Specific Terminal Only - Disputed PIC Change - End User Initiated Through AC.

Only the terminal provided is to be subscribed to the AC.

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#### Part A, Page 3

Issue Title: AC Subscription Order For End User Customer Identified Unauthorized Change from Submitting AC

0122= Working Telephone Number (WTN) Only - Disputed PIC Change - End User Initiated Through AC.

Only the WTN provided is to be subscribed to the AC.

The Committee created one new TCSI 20XX as a response to the above TCSIs 0120, 0121 & 0122. When an AP populates the Disputed CIC data element on TCSI 2039, it should appear as the unauthorized CIC.

2039= Confirmation of An AC Initiated Order - Disputed PIC Change - End User Initiated Through AC

The end user has changed their PIC as a result of a dispute over the current AC PIC selection. The dispute was reported to the submitting AC. For this TCSI, the contents of the Disputed CIC data element should be the reported unauthorized CIC.

- The Committee created 3 new reject TCSIs to be used as responses to TCSIs 0120, 0121 & 0122. Other existing reject TCSIs may also be used in response to these new 01XXs.
- 3161 Working Telephone Number (WTN) Rejected AC Not Previous Carrier

  The AC initiated order is rejected due to AC not shown on AP records as previous carrier.
- 3162 Working Telephone Number (WTN) Rejected Current PIC not AC initiated

  The AC initiated order is rejected due to current PIC selection on AP records not AC initiated.
- 3163 Primary Interexchange Carrier (PIC) Change Charge Indicator is Blank.

  PIC Change Charge Indicator value of 'Y' is required by the AP for the submitted TCSI.

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#### Part A, Page 4

Issue Title: AC Subscription Order For End User Customer Identified Unauthorized Change from Submitting AC

A new TCSI 22XX was created as response to the TCSIs 0120, 0121 & 0122. When an AP populates the Disputed CIC data element on TCSI 2243, it should appear as the authorized CIC.

2243 = End User Canceled AC Service Through Another AC Order - Disputed PIC Change
The AC has been canceled as a result of end user AC contact reporting disputed PIC selection.
For this TCSI, the contents of the Disputed CIC data element should be the authorized CIC.

A new TCSI 28XX was created as response to TCSIs 0120, 0121 & 0122. The follow up TCSI 20XX can be the newly created 2039 or another TCSI 20XX.

2832 = End User Selected AC Through AC Initiated Order - WTN and Associated Terminals if Applicable - Disputed PIC Change

Notification to AC that an AC order has been accepted and passed to the Switch for processing. This TCSI may be generated in response to TCSIs 0120, 0121 or 0122. When a positive Switch acknowledgment is received, the AC will receive TCSI 2039.

The Committee created new TCSIs to address PIC Disputes in a local resale environment. If an AP accepts an 01XX order from an AC that created the alleged slam, then the 0120, 0121 or 0122 should be accepted and worked. Newly created TCSIs 4014 & 4216 will be the appropriate responses. If the AP does not accept PIC orders on resold lines, the current TCSIs 3147 or 3148

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Issue Title: AC Subscription Order For End User Customer Identified Unauthorized Change from Submitting AC

would apply.

4014 = Switch Provider (SWP) Notification - AC Initiated Order - Disputed PIC Change - End User Initiated Through AC

The end user has changed their PIC as a result of a dispute over the current AC PIC selection. The dispute was reported to the submitting AC. For this TCSI, the contents of the Disputed CIC data element should be the reported unauthorized CIC.

4216 =Service Canceled - End User Canceled AC Service Through Another AC Order - Disputed PIC Change

The AC has been canceled as a result of end user AC contact reporting disputed PIC selection. For this TCSI, the contents of the Disputed CIC data element should be the authorized CIC.

The Committee reviewed the existing TCSI 3130 during the creation of the new rejects for this new PIC dispute process. The name of this TCSI was changed to include the proper name of the data element "PIC Change Charge Indicator".

3130 = Primary Interexchange Carrier (PIC) Change Charge Indicator Invalid
PIC Change Charge Indicator does not equal 'Y' or blank.

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#### Part A, Page 6

Issue Title: AC Subscription Order For End User Customer Identified Unauthorized Change from Submitting AC

The Committee created new data matrices for all new TCSIs. The Committee discussed the need to create new process flows. It was determined that the issue champion should bring in a new issue to address the process flows.

Issue 1877 created a new data element Disputed CIC. Newly created 2039 and 2243 need to be added to the note in the data element definition.

The issue moved to initial closure.